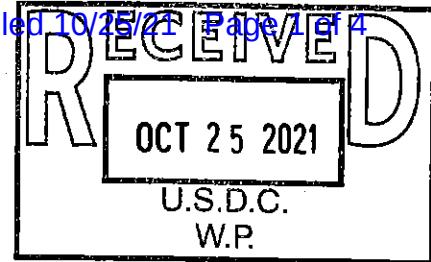


UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Case 2:21-cv-00214-CS Document 39 Filed 10/25/21 Page 1 of 4



MALIK L. BROWN,

Plaintiff,

- against -

CASE NO. 21CIV.214(CS)

STEPHEN URBANSKI, ISSA JUNES, JOSEPH  
DEACON, MARK DELBIANCO, ALEXANDER  
MINARD, BRENDAN WALSH, DANIELLE GEBRON,  
ANTHONY ANNUCCI,

Defendants.

I,

Malik Brown Object to Counsel<sup>3</sup>  
for Defendants motion to DISMISS  
my file from the preliminary  
Statement up to the conclusion  
Counsel Assualts my character  
as an Incarcerated individual  
I have limited protection from  
harm these are my points  
Point 1 # 1 Cleary stated a  
claim and [REDACTED] produced  
documents in support of my  
TAC [REDACTED] Stating violations of my  
8<sup>th</sup> amendment, (point #2 not only  
did defendants not only failed to  
protect the lack of supervision  
which resulted in serious bodily harm to me

Defendants even goes as far as  
fabricating the time of incident and  
time of examination (Point #3) the  
Video clearly shows that my attacker  
was subdued the officer deliberately  
came to me and applied O.C. spray  
I ask the court that defendants  
motion is dismissed and the  
discovery process is the next  
step that video need to be seen  
by a jury I received outside  
medical care not once but twice  
I ask the court that defendants  
are not granted qualified immunity  
Today is Oct 19<sup>th</sup> I'm just getting my  
defendants reply I ask the court  
to please grant my motion to  
proceed this is not just an incident  
I feel I'll never be the same I  
continue to suffer from PTSD I'm  
on multiple ~~medications~~ medications to help  
me cope this is more than  
anything I've been thru I ask  
that we proceed to discovery  
that video needs to be seen  
I ask the court that they grant my

motion to proceed and dismiss  
defendant's motion to dismiss my  
FAC I've clearly stated a claim  
backed my claim with producione  
medical documents as well as  
video transcript of assault I ask  
the court to ~~please~~ proceed

### Conclusion

For all the above/foregoing reasons  
plaintiff respectfully request  
that the court denies defendants  
motion to dismiss my FAC and  
grant plaintiff's motion to  
proceed to discovery

Dated, Southport  
Correctional  
10-19-21 Facility  
Pine City  
NY.

Plaintiff, MALIK L. Brown

CC: Probate intake unit

CC: Brown Marshal

SOUTHPORT CORRECTIONAL FACILITY  
P.O. BOX 2000  
PINE CITY, NEW YORK 14871-2000

NAME: Dawn Brown DIN: W0AHO0



US POSTAGE

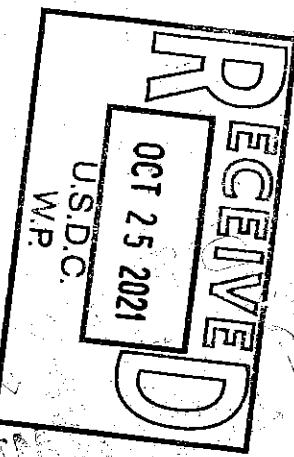
\$000.53<sup>00</sup>



ZIP 14871  
041M11274238

PRO SE INmate Facility

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK  
300 QUARROPS STREET  
WHITE PLAINS, NEW YORK



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SOUTHPORT

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